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March 12, 2008

Via ECF

Honorable Gerard E. Lynch
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: William David Tasky v. Moran Towing Corporation, Inc.
07 Civ. 6949

Dear Judge Lynch:

I represent William Tasky, the plaintiff in the above-captioned action. I am writing with the consent of my adversary to request a 30-day extension of the deadline for completion of fact discovery in this case, until June 2, 2008. The discovery date was reset to May 1, 2008 in a previous request for an extension of this deadline.

In attempting to schedule the perpetuation deposition of plaintiff's treating physician, who is located in Gloucester, Va., the earliest date on which the parties and the doctor could arrange to conduct the deposition is May 15, 2008. This is the reason for the joint request to extend the date for completion of all fact discovery to June 2, 2008.

Under the terms of the Civil Case Management Plan, the joint pre-trial order will be due no later than 30 days after the new date for completion of discovery. The other date affected by this application is the next Case Management conference which was set for May 8, 2008 at 11 a.m. We suggest a date for the next Case Management conference convenient to the Court in the week of June 9, 2008.

Thank you for your attention to this request.

Respectfully submitted,

HOFMANN & ASSOCIATES

By: 

Lawrence A. Arcell

LAA/gh

c: Jethro M. Eisenstein, Esq.